

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA : CRIMINAL NO.
:
:
v. : I N F O R M A T I O N
: 18 U.S.C. § 2
: 18 U.S.C. § 1001
RUSSELL E. ROBERTS : 18 U.S.C. § 2314
:
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The United States Attorney charges that:

COUNT 1

Beginning in about 1994 and continuing to at least March 5, 2003, in the Southern District of Ohio and elsewhere, the defendant, RUSSELL E. ROBERTS, willingly, knowingly, and unlawfully caused to be transported, transmitted, and transferred in interstate commerce from Butler County, in the Southern District of Ohio, goods, wares, and merchandise of the value of \$5,000.00 or more, that is funds in the approximate amount of \$617,562.88 belonging to the Friends of John Boehner, knowing the same to have been stolen, converted, and taken by fraud.

All in violation of 18 U.S.C. §§ 2314 and 2.

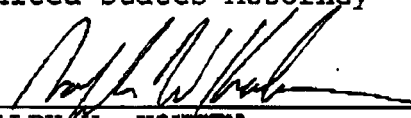
COUNT 2

In the years 1994 through 2002, in the Southern District of Ohio and elsewhere, the defendant, RUSSELL E. ROBERTS, in a matter within the jurisdiction of the Federal Election Commission, an agency of the United States, knowingly and willfully made and used a material false writing and document by

presenting to the Federal Election Commission multiple reports of activity by the Friends of John Boehner, knowing the same to be false in that the defendant overstated in those reports the net operating expenses incurred by the Friends of John Boehner, because, as the defendant well knew, he had falsely characterized in the records of the Friends of John Boehner as net operating expenses the amount of \$617,562.88 in order to conceal the fact that he had embezzled and converted that \$617,562.88 to his own use.

All in violation of 18 U.S.C. §§ 1001 and 2.

GREGORY G. LOCKHART
United States Attorney



RALPH W. KOHNEN
Deputy Criminal Chief

n: robertsinf.wpd 08/05/03